

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-GBL-BMK

DEFENDANT-INTERVENORS' PRETRIAL DISCLOSURES

Defendant-Intervenors the Virginia House of Delegates and Virginia House of Delegates Speaker William J. Howell ("Defendant-Intervenors"), through their counsel, and pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, and the Initial Pretrial, Scheduling, and Discovery Order entered on March 2, 2015, hereby make their pretrial disclosures as follows:

I. Trial Witnesses

Defendant-Intervenors expect to call the following witnesses at trial:

1. Delegate Chris Jones – Mr. Jones is a member of the Virginia House of Delegates and was the architect of the redistricting plan at issue in this proceeding. He will testify about the plan and the 2011 redistricting process.
2. Thomas Hofeller – Dr. Hofeller has been designated as an expert witness and will testify about the matters addressed in his expert report.
3. Trey Hood – Dr. Hood has been designated as an expert witness and will testify about the matters addressed in his expert report.
4. Jonathan Katz – Dr. Katz has been designated as an expert witness and will testify about the matters addressed in his expert report.

Defendant-Intervenors' submit this list of witnesses without waiving any of their rights, and specifically reserve the right to call any rebuttal or impeachment witnesses and to

supplement this list if any listed witness becomes unavailable to testify at trial.

II. Proposed Trial Exhibits

Defendant-Intervenors' proposed exhibits are attached hereto as Exhibit A.

Dated: June 22, 2015

Respectfully submitted,

VIRGINIA HOUSE OF DELEGATES
AND VIRGINIA HOUSE OF DELEGATES
SPEAKER WILLIAM J. HOWELL

By Counsel

/s/ Jennifer M. Walrath

E. Mark Braden (*pro hac vice*)

Jennifer M. Walrath (VSB No. 75548)

Katherine L. McKnight (VSB No. 81482)

Richard B. Raile (VSB No. 84340)

BAKER HOSTETLER LLP

1050 Connecticut Avenue, NW Suite 1100

Washington, DC 20036

Telephone: 202.861.1500

Facsimile: 202.861.1783

mbraden@bakerlaw.com

jwalrath@bakerlaw.com

kmcknight@bakerlaw.com

rraile@bakerlaw.com

Of counsel:

Dalton L. Oldham, Esq.

1119 Susan St.

Columbia, SC 29210

Telephone: 803-772-7729

dloesq@aol.com

*Attorneys for the Virginia House of Delegates and
Virginia House of Delegates Speaker William J. Howell*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2015, the foregoing Defendant-Intervenors' Pretrial Disclosures was filed and served on all counsel of record pursuant to the Court's electronic filing procedures using the Court's CM/ECF system.

/s/ Jennifer M. Walrath

E. Mark Braden (*pro hac vice*)

Jennifer M. Walrath (VSB No. 75548)

Katherine L. McKnight (VSB No. 81482)

Richard B. Raile (VSB No. 84340)

BAKER HOSTETLER LLP

1050 Connecticut Avenue, N.W. Suite 1100

Washington, D.C. 20036

Tel.: 202-861-1680

Fax: 202-861-1783

mbraden@bakerlaw.com

jwalrath@bakerlaw.com

kmcknight@bakerlaw.com

rraile@bakerlaw.com

*Attorneys for the Virginia House of Delegates and
Virginia House of Delegates Speaker William J. Howell*